

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KATHLEEN HUPFAUER,

Plaintiff,

v.

CITIBANK, N.A.; EQUIFAX
INFORMATION SERVICES, LLC; and
EXPERIAN INFORMATION SOLUTIONS,
INC.,

Defendants.

Case No. 1:16-cv-00475

Hon. Ruben Castillo

**DEFENDANT EXPERIAN INFORMATION SOLUTIONS, INC.’S
MOTION TO DISMISS THE COMPLAINT**

NOW COMES Defendant Experian Information Solutions, Inc. (“Experian”), by and through its undersigned attorneys, and pursuant to Federal Rule of Civil Procedure 12(b)(6), and hereby moves to dismiss Plaintiff’s Complaint against Experian with prejudice for failure to state a claim on which relief can be granted. In support of its Motion, Experian submits its Memorandum of Law, filed contemporaneously herewith, and incorporates the same as if fully set forth herein.

WHEREFORE, Defendant Experian Information Solutions, Inc. respectfully requests that the Court grant the present Motion to Dismiss and issue an order dismissing Plaintiff’s Complaint with prejudice.

Dated this 24th day of March, 2016.

By: /s/ Christopher A. Hall

JONES DAY

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*Counsel for Defendant Experian
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CERTIFICATE OF SERVICE

I hereby certify that, on March 24, 2016, a copy of the foregoing was filed using the CM/ECF system, which will effectuate service on all counsel of record.

/s/ Christopher A. Hall